

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: TESTOSTERONE REPLACEMENT
THERAPY PRODUCTS LIABILITY
LITIGATION

MDL No. 2545

Master Docket Case No. 1:14-cv-01748

Honorable Matthew F. Kennelly

THIS DOCUMENT RELATES TO ALL
CASES

**PSC'S MOTION TO COMPEL DISCOVERY
FROM DEFENDANTS ABBVIE INC. AND ABBOTT LABORATORIES**

The Plaintiffs' Steering Committee ("PSC") hereby moves, pursuant to Federal Rule of Civil Procedure 37 and the inherent power of the Court, for an order compelling Defendants AbbVie Inc. and Abbott Laboratories (collectively, "AbbVie") to (i) provide copies of documents produced by all parties and transcripts of the depositions taken in *United States ex rel. King v. Solvay S.A.*, No. H-06-2662 (S.D. Tex.) (the "King Documents"); (ii) provide a copy of the entire AndroGel adverse event database(s); and (iii) respond to several of the PSC's Interrogatories that AbbVie answered by impermissibly invoking Rule 33(d) of the Federal Rules of Civil Procedure without identifying the documents that contain responsive information with sufficient specificity. A Memorandum of Law in support of this motion is filed herewith.

Accordingly, the PSC respectfully requests that the Court enter an order compelling AbbVie to produce the above information within 15 days of the Court's Order.

DATED: January 16, 2014

Respectfully submitted,

/s/ Trent B. Miracle

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Plaintiffs' Co-Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2015, the foregoing PSC's Motion to Compel Discovery From Defendants AbbVie Inc. and Abbott Laboratories was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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